

2067 william sanko1.txt

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1 DPONENT
2 being first duly sworn, as hereinafter
3 certified, was examined and testified as
4 follows:

5 - - - - -

6 CROSS-EXAMINATION

7 BY 6789:

8 Q Can you please state your name.
9 A It's Bill Sanko, William John Sanko.

10 Q Can you please state your address and
11 telephone number.

12 A The address is 6590 Jamelia Court,
13 Fairview, Pennsylvania. Phone number is
14 814-474-1517.

15 Q Mr. Sanko, I will be asking you a series of
16 questions today. After I'm done, Mr. Gutkin
17 will likely then ask you some more questions.
18 If you do not understand a question, please tell
19 us --

20 A Okay.

21 Q -- and we will either clarify the question
22 or repeat it for you.

23 A All right.

24 Q Is that acceptable?

25 A Yes.

TACKLA & ASSOCIATES

□

2

1 Q Great. Mr. Gutkin may object to a question
2 I ask, I may object to a question that
Page 1

2067 william Sankol.txt

5 Q -- facility at Motorola or Indala?

6 A No.

7 Q What are the names of the people at
8 Motorola that you've had contact with over the
9 years?

10 A You know, I was just trying to think of
11 that because I did talk to a guy from Motorola
12 and I did talk to a guy from Indala. I don't
13 remember the names.

14 Q Is there any document that you could look
15 at that could refresh your recollection?

16 A Yes.

17 Q Do you have that document with you today?

18 A No, I don't. I probably have it on my
19 address in my address book on my computer, and
20 I'd be glad to get that for you. I might even
21 have it in the file. I did talk to a guy from
22 Motorola more times than Indala, but I'd have
23 both of those names and I would have files -- I
24 believe that that would be the press pad files
25 that would have their names in there.

TACKLA & ASSOCIATES

□

85

1 Q When was the last time you had contact with
2 someone at Motorola or Indala?

3 A Oh, boy. Motorola was a long time ago and
4 I'm going to say maybe five, six, seven years;
5 and Indala, three, four years.

6 Q Three, four years ago?

7 A Yes. I quoted them a laminator, Indala,
8 and they didn't purchase it, they purchased a

Page 75

2067 william Sankol.txt

9 competitor's laminator.

10 Q What year did you quote that laminator?

11 A Oh, it's a good three, four years ago.

12 Q Okay.

13 A Oh, I'm wrong. It wasn't Indala, it was
14 HID Corporation. So I'm wrong.

15 Q Okay. We're going to switch gears again.

16 Prior to 1995, are you aware of any
17 laminators that were used to laminate plastic
18 cards having a hard object between plastic
19 sheets?

20 A I don't recall when chip cards came along.
21 I don't know. See, the date I'm not sure of. I
22 can't honestly tell you. I mean, somewhere
23 along the line I became aware of the fact that
24 they were putting chips in cards, but when that
25 was, I don't know. I've never done it.

TACKLA & ASSOCIATES

□ 86

1 Q When you say chip in cards, do you mean a
2 chip between two sheets of plastic?

3 A Yeah.

4 Q Okay.

5 A Well, chip between. They were never
6 imbedded, they were always placed in a drilled
7 or milled pocket, that's the way they decided to
8 do it. I've never seen them imbedded like Keith
9 does it.

10 You know, I've been in I don't know
11 how many plants, I've been in almost everyone's

2067 William Sanko1.txt
12 plant and talked to them about processes, I've
13 never seen that imbedding process done. I'm
14 confident it was never done prior to Keith doing
15 it, but that's my own opinion, I'm going on
16 record as saying that.

17 Q So in your experience, gosh, since 1977
18 with Sanko Sales, the plastic cards that you've
19 come across over the years have been simply
20 sheets --
21 A Of plastic.

22 Q -- of plastic, one stacked on top of the
23 other and laminated?

24 A Yes.

25 Q Okay.

TACKLA & ASSOCIATES

□ 87

1 A I can't -- I can't even say that ever one
2 of my laminators was used to make chip cards. I
3 don't personally know that. I mean, I've never
4 even had anybody say that we intend to use it
5 for this purpose, strictly plastic cards.

6 Q Could the laminators you designed in the
7 '80s have been used to laminate --

8 A I don't know.

9 1234: Object.

10 Q -- a chip between two plastics sheets?

11 1234: Object.

12 A I honestly don't know.

13 1234: Object to form.

14 A Maybe. I don't know.

15 1234: If I object, let me
Page 77